

August 30, 2013

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation in Dockets No. 10-51 and 03-123;
Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618 (2013)

Dear Ms. Dortch:

On Wednesday, August 28th, Jarrod Musano, Chief Executive Officer, and David Bahar, Vice President of Government and Regulatory Affairs, each of Convo Communications, LLC, and their counsel, Phillip Marchesiello of Wilkinson Barker Knauer, LLP (collectively “Convo”), met with Elaine Gardner, Elliot Greenwald, Gregory Hlibok, and Karen Peltz Strauss of the Consumer and Governmental Affairs Bureau (“CGB”) of the Federal Communications Commission (“Commission”) and Diane Mason (by teleconference) and Andrew Multz of the Commission’s Office of the Managing Director (“OMD”).

Separately on the same day, Convo also met with Priscilla Argeris, Legal Advisor to Commissioner Jessica Rosenworcel and, by teleconference, Nicholas Degani, Wireline Legal Advisor to Commissioner Ajit Pai.

During its meeting with the CGB and OMD staff, Convo discussed its role in the video relay services (“VRS”) sector and certain VRS innovations that Convo currently is developing. In addition, Convo discussed the process for populating the Telecommunications Relay Service User Registration Database (“TRS-URD”) with appropriate registration information regarding Convo’s customers. In particular, Convo expressed concerns regarding the potential for a subset

of customers to be disenfranchised if the customer verification procedure used by the administrator of the TRS-URD initially results in “false negatives” with respect to certain customers. Convo also explained that VRS users may consider the collection of the newly required registration information to be an invasion of their privacy because VRS users previously have not been required to provide their social security numbers or dates of birth to utilize VRS.

In addition, Convo discussed the Commission's proposal ultimately to reduce the VRS speed of answer (“SOA”) requirement to 10 seconds measured on a daily basis. Convo believes that it achieves among the best, if not the best, SOA time in the VRS industry, with an 11-second average SOA time since Convo last year began utilizing a proprietary ACD. However, Convo expressed that it would be exceedingly difficult for VRS providers consistently to achieve a 10-second SOA time *measured on a daily basis* unless VRS providers expend significant additional resources to overstaff their call centers, which is not cost efficient. Accordingly, Convo suggested that the Commission reconsider calculating SOA times on a daily basis and also consider not dropping the required SOA time to 10 seconds. Convo noted that it currently complies with the 30-second SOA requirement that will take effect in July of 2014.

Finally, Convo discussed with the CGB and OMD staff their current expectations with respect to the contracting process for the retention of an administrator for the neutral VRS platform and the reference access technology.

During Convo’s meetings with Mrs. Argeris and Mr. Degani, Convo described its evolution from a white label VRS provider to a conditionally certified VRS provider, as well as the unique challenges imposed on smaller VRS providers like Convo by the automatic biannual rate cuts recently adopted by the Commission.

Please do not hesitate to contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David Bahar", with a stylized, cursive script.

David Bahar, Vice President of Government and
Regulatory Affairs
Convo Communications, LLC

CC (by email): Priscilla Argeris
Nicholas Degani
Elaine Gardner
Elliot Greenwald
Gregory Hlibok
Diane Mason
Andrew Mulitz
Karen Peltz Strauss